

EXHIBIT 3-50

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Case No. 11 Civ. 0691 (LAK)

-----x
4 CHEVRON CORPORATION,
5 Plaintiff,
6 - against -
7 STEVEN DONZIGER, et al.,
8 Defendants.

-----x
9

10 June 6, 2019
11 9:45 a.m.

12 200 Park Avenue
13 New York, New York

14
15 EXAMINATION BEFORE TRIAL of LAURA MILLER,
16 held at the offices of GIBSON DUNN & CRUTCHER LLP,
17 located at 200 Park Avenue, New York, New York
18 10166, before Anthony Giarro, a Registered
19 Professional Reporter, a Certified Realtime
20 Reporter and a Notary Public of the State of New
21 York.

<p style="text-align: right;">Page 14</p> <p>1 LAURA MILLER</p> <p>2 is it joint or is it joint with right of</p> <p>3 survivorship or is there some other</p> <p>4 aspect to the joint ownership that you're</p> <p>5 aware of?</p> <p>6 A No.</p> <p>7 MR. DONZIGER: Just to be</p> <p>8 clear, I'm not your lawyer. Just to</p> <p>9 state for the record, I'm here</p> <p>10 representing myself. If there are</p> <p>11 technical things being said in</p> <p>12 questions that you don't understand,</p> <p>13 please tell Ms. Neuman that you don't</p> <p>14 understand or repeat it or whatever.</p> <p>15 You don't have to answer a question</p> <p>16 if you don't know the answer.</p> <p>17 THE WITNESS: Okay.</p> <p>18 Q I'm always happy to clarify.</p> <p>19 A This is a joint ownership.</p> <p>20 Q You're not aware of anything</p> <p>21 that impacts the way you hold these</p> <p>22 shares, legally, other than what's on</p> <p>23 this document that we've marked as</p> <p>24 Exhibit 5648?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 16</p> <p>1 LAURA MILLER</p> <p>2 Q Have you seen this document</p> <p>3 before, Ms. Miller?</p> <p>4 A Yes.</p> <p>5 Q And if you turn to the last</p> <p>6 page, the document bears the Bates</p> <p>7 numbers Donziger Co-Op 59 through 62.</p> <p>8 If you turn to 62, is that</p> <p>9 your signature?</p> <p>10 A Yes.</p> <p>11 Q Is this the mortgage that</p> <p>12 you obtained in connection with</p> <p>13 purchasing the apartment?</p> <p>14 A Yes.</p> <p>15 Q And when you purchased the</p> <p>16 apartment, do you recall the purchase</p> <p>17 price?</p> <p>18 A 1,000,550, I think.</p> <p>19 MR. DONZIGER: If you don't</p> <p>20 remember, you can just say I don't</p> <p>21 remember.</p> <p>22 A No. I think it was 1.5 or</p> <p>23 something like that.</p> <p>24 MR. DONZIGER: If you don't</p> <p>25 remember, say I don't remember. You</p>
<p style="text-align: right;">Page 15</p> <p>1 LAURA MILLER</p> <p>2 Q And you haven't entered into</p> <p>3 any separate written agreements about the</p> <p>4 apartment?</p> <p>5 A No.</p> <p>6 Q With Mr. Donziger, I mean.</p> <p>7 MS. NEUMAN: Let's go off</p> <p>8 the record.</p> <p>9 THE VIDEOGRAPHER: The time</p> <p>10 on the video monitor is 9:58 a.m.</p> <p>11 We're off the record.</p> <p>12 (A short recess was taken.)</p> <p>13 THE VIDEOGRAPHER: We are</p> <p>14 back on the record. The time on the</p> <p>15 video monitor is 10:01 a.m.</p> <p>16 MS. NEUMAN: I'm going to</p> <p>17 hand the witness a document that I've</p> <p>18 marked as Exhibit 5649.</p> <p>19 (The above-referred-to</p> <p>20 document was marked as Exhibit 5649</p> <p>21 for identification, as of this date.)</p> <p>22 MS. NEUMAN: Which appears</p> <p>23 to be a mortgage-related document in</p> <p>24 connection with the purchase of the</p> <p>25 apartment at 245 West 104th.</p>	<p style="text-align: right;">Page 17</p> <p>1 LAURA MILLER</p> <p>2 can say somewhere around.</p> <p>3 THE WITNESS: Somewhere</p> <p>4 around.</p> <p>5 Q Just to clarify what</p> <p>6 Mr. Donziger's saying, if you'd just be</p> <p>7 speculating and making something up,</p> <p>8 obviously, you shouldn't say it. But if</p> <p>9 you have a reasonable estimate, then you</p> <p>10 can just clarify that you're giving an</p> <p>11 estimate.</p> <p>12 A Okay.</p> <p>13 Q But we're entitled to your</p> <p>14 best estimate if you have one.</p> <p>15 A Okay. Best estimate, 1.55.</p> <p>16 Q The mortgage was 1 million,</p> <p>17 and the down payment was slightly above</p> <p>18 500,000; is that correct?</p> <p>19 A Yes.</p> <p>20 Q And have you refinanced this</p> <p>21 mortgage since?</p> <p>22 A No.</p> <p>23 Q Since the purchase?</p> <p>24 A No.</p> <p>25 Q Do you know the current</p>

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<p style="text-align: right;">Page 18</p> <p>1 LAURA MILLER</p> <p>2 balance of the mortgage?</p> <p>3 A I'm going to estimate.</p> <p>4 About 800,000 remaining.</p> <p>5 Q And is the mortgage</p> <p>6 currently held by Wells Fargo?</p> <p>7 A No.</p> <p>8 Q Is that the same as Mortgage</p> <p>9 IT?</p> <p>10 A I think Mortgage IT is the</p> <p>11 company. I don't know.</p> <p>12 Q Separate and apart from the</p> <p>13 mortgage with Wells Fargo, are there any</p> <p>14 other liens or encumbrances on the</p> <p>15 apartment?</p> <p>16 A No.</p> <p>17 Q And have you had the</p> <p>18 apartment appraised at any time in the</p> <p>19 last two to four years?</p> <p>20 A No.</p> <p>21 Q Do you have a current --</p> <p>22 would you have a current estimate as to</p> <p>23 its current value?</p> <p>24 A No.</p> <p>25 Q Have you made any</p>	<p style="text-align: right;">Page 20</p> <p>1 LAURA MILLER</p> <p>2 MR. DONZIGER: If you know.</p> <p>3 A No.</p> <p>4 MR. DONZIGER: No. If you</p> <p>5 know.</p> <p>6 THE WITNESS: No. I don't</p> <p>7 know.</p> <p>8 Q Do you have a person that</p> <p>9 does your taxes?</p> <p>10 A Yes.</p> <p>11 Q And who is that?</p> <p>12 A Gary Greenberg.</p> <p>13 Q The same person that</p> <p>14 Mr. Donziger uses?</p> <p>15 A Yes.</p> <p>16 Q And do you file taxes</p> <p>17 jointly or separately?</p> <p>18 A Separately.</p> <p>19 Q And in your filings as an</p> <p>20 individual, married, filing separately,</p> <p>21 do you claim Mr. Donziger in any way as a</p> <p>22 dependent?</p> <p>23 A No.</p> <p>24 Q Or reflect him on your</p> <p>25 taxes?</p>
<p style="text-align: right;">Page 19</p> <p>1 LAURA MILLER</p> <p>2 significant improvements to the apartment</p> <p>3 since you bought it?</p> <p>4 A No.</p> <p>5 Q So you haven't remodeled or</p> <p>6 done anything like that?</p> <p>7 A No.</p> <p>8 Q The payments that are made</p> <p>9 on the mortgage, are they a joint</p> <p>10 responsibility of yourself and</p> <p>11 Mr. Donziger or does one or the other of</p> <p>12 you normally make them?</p> <p>13 A Depends on the month.</p> <p>14 Sometimes I do; sometimes he does.</p> <p>15 Q But you don't have any</p> <p>16 agreement about who's going to pay the</p> <p>17 mortgage?</p> <p>18 A No.</p> <p>19 Q Do you have any agreement</p> <p>20 relating to who claims any tax deductions</p> <p>21 related to mortgage payments?</p> <p>22 A No.</p> <p>23 Q And do you ordinarily make</p> <p>24 those claims or does it depend on which</p> <p>25 payment you make?</p>	<p style="text-align: right;">Page 21</p> <p>1 LAURA MILLER</p> <p>2 A No.</p> <p>3 Q Do you ever reflect any of</p> <p>4 his income on your taxes?</p> <p>5 A No.</p> <p>6 Q And that would include --</p> <p>7 I'll withdraw that. I'll just ask a new</p> <p>8 question.</p> <p>9 Mr. Donziger from time to</p> <p>10 time has transferred money from his bank</p> <p>11 accounts to your bank account; correct?</p> <p>12 A Yes.</p> <p>13 Q And are those transfers</p> <p>14 reflected on your taxes, to the extent</p> <p>15 you know?</p> <p>16 A No.</p> <p>17 Q No, they're not or no, you</p> <p>18 don't know?</p> <p>19 A No, they're not.</p> <p>20 Q Can you tell me the current</p> <p>21 square footage of the apartment?</p> <p>22 A Approximately 1500</p> <p>23 square feet.</p> <p>24 Q Have you ever attempted to</p> <p>25 sell the apartment?</p>

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<p style="text-align: right;">Page 22</p> <p>1 LAURA MILLER</p> <p>2 A No.</p> <p>3 Q Expenses related to the</p> <p>4 apartment, like co-op fees, utilities,</p> <p>5 those sorts of things, whose</p> <p>6 responsibilities are those?</p> <p>7 A Shared.</p> <p>8 Q Joint?</p> <p>9 A Joint.</p> <p>10 Q Whenever you say "joint,"</p> <p>11 you're referring to yourself and</p> <p>12 Mr. Donziger; correct?</p> <p>13 MS. NEUMAN: Off the record.</p> <p>14 THE VIDEOGRAPHER: The time</p> <p>15 on the video monitor is 10:07 a.m.</p> <p>16 We're off the record.</p> <p>17 (A short recess was taken.)</p> <p>18 THE VIDEOGRAPHER: We are</p> <p>19 back on the record. The time on the</p> <p>20 video monitor is 10:08 a.m.</p> <p>21 (The requested portion was</p> <p>22 read back by the court reporter.)</p> <p>23 A Yes.</p> <p>24 MS. NEUMAN: I'm going to</p> <p>25 hand the witness a document that I'm</p>	<p style="text-align: right;">Page 24</p> <p>1 LAURA MILLER</p> <p>2 see that?</p> <p>3 A Yes.</p> <p>4 Q Did Mr. Donziger ever</p> <p>5 discuss the receipt of this restraining</p> <p>6 notice with you?</p> <p>7 A No.</p> <p>8 Q Do you know of any -- so</p> <p>9 this is dated April 16th of 2008.</p> <p>10 A Okay.</p> <p>11 Q Are you aware of transfers</p> <p>12 that Mr. Donziger has made of property</p> <p>13 since April of 2018?</p> <p>14 A No.</p> <p>15 MR. DONZIGER: Can we take a</p> <p>16 break?</p> <p>17 MS. NEUMAN: Sure. How long</p> <p>18 of a break do you want to take?</p> <p>19 MR. DONZIGER: Short. Like</p> <p>20 five minutes.</p> <p>21 THE VIDEOGRAPHER: The time</p> <p>22 on the video monitor is 10:10 a.m.</p> <p>23 We're off the record.</p> <p>24 (A short recess was taken.)</p> <p>25 THE VIDEOGRAPHER: We are</p>
<p style="text-align: right;">Page 23</p> <p>1 LAURA MILLER</p> <p>2 marking as Exhibit 5650. It's</p> <p>3 entitled "Chevron Corporation's First</p> <p>4 Information Subpoena in Aid of</p> <p>5 Supplemental Judgment and Restraining</p> <p>6 Notice to Defendant Steven Donziger,</p> <p>7 The Law Offices of Steven Donziger</p> <p>8 and Donziger & Associates PLLC."</p> <p>9 (The above-referred-to</p> <p>10 document was marked as Exhibit 5650</p> <p>11 for identification, as of this date.)</p> <p>12 Q Have you seen this document</p> <p>13 before, Ms. Miller?</p> <p>14 A No.</p> <p>15 Q On the second page under the</p> <p>16 heading Restraining Notice, do you see</p> <p>17 where it says "take notice that pursuant</p> <p>18 to CPLR 5222(b), which is set forth in</p> <p>19 full herein, you -- referring to</p> <p>20 Mr. Donziger -- are hereby forbidden to</p> <p>21 make or suffer any sale, assignment,</p> <p>22 transfer, inference with any property in</p> <p>23 which you have an interest to pay over or</p> <p>24 otherwise dispose of any debt owed to</p> <p>25 you, except as provided in 5222." Do you</p>	<p style="text-align: right;">Page 25</p> <p>1 LAURA MILLER</p> <p>2 back on the record. The time on the</p> <p>3 video monitor is 10:14 a.m.</p> <p>4 Q You understand you're still</p> <p>5 under oath?</p> <p>6 A Yes.</p> <p>7 Q Did you have any</p> <p>8 conversation relating to your deposition</p> <p>9 during the break?</p> <p>10 A What was just discussed, is</p> <p>11 that I need to be able to just answer the</p> <p>12 questions as best I possibly can.</p> <p>13 Q You mean discussed with</p> <p>14 Mr. Donziger?</p> <p>15 A Yes.</p> <p>16 Q Did he say anything else</p> <p>17 relating to your deposition?</p> <p>18 A No.</p> <p>19 Q With regard to shared</p> <p>20 expenses, the ones that you and</p> <p>21 Mr. Donziger shared, do you have a budget</p> <p>22 that you go by or do you just generally</p> <p>23 share?</p> <p>24 A Just generally share.</p> <p>25 Q So you don't keep track, for</p>

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<p style="text-align: right;">Page 42</p> <p>1 LAURA MILLER</p> <p>2 any access rights to those accounts?</p> <p>3 A No.</p> <p>4 Q He's not an authorized user</p> <p>5 or beneficiary?</p> <p>6 A Nothing.</p> <p>7 Q Is there a beneficiary on</p> <p>8 these accounts other than Mr. Donziger?</p> <p>9 And I'm not asking you who it is. I'm</p> <p>10 just asking if there is one.</p> <p>11 A Yes.</p> <p>12 Q And it's someone else?</p> <p>13 A Yes.</p> <p>14 Q You mentioned a financial</p> <p>15 advisor.</p> <p>16 Who is that?</p> <p>17 A Her name --</p> <p>18 MR. DONZIGER: Wait.</p> <p>19 Objection.</p> <p>20 A This is ridiculous.</p> <p>21 MR. DONZIGER: Why is that</p> <p>22 relevant? The name of the financial</p> <p>23 advisor?</p> <p>24 MS. NEUMAN: To the extent</p> <p>25 they have responsive documents.</p>	<p style="text-align: right;">Page 44</p> <p>1 LAURA MILLER</p> <p>2 answer, Ms. Miller?</p> <p>3 A I'm choosing not to answer.</p> <p>4 MS. NEUMAN: You understand</p> <p>5 you can't direct the witness not to</p> <p>6 answer?</p> <p>7 MR. DONZIGER: I'm not so</p> <p>8 sure about that. I'm not her lawyer.</p> <p>9 But it's my view based on research</p> <p>10 I've done that if there's a marital</p> <p>11 privilege issue, even if she</p> <p>12 disagrees, I'm going to ask her to</p> <p>13 respect my marital privilege.</p> <p>14 And to the extent we need to</p> <p>15 deal with it post-today, we can. I</p> <p>16 mean, write an e-mail. And maybe</p> <p>17 I'll reconsider, whatever. I'm not</p> <p>18 really looking for more information</p> <p>19 here. But I do want to protect my</p> <p>20 privileges.</p> <p>21 Q I'm going to ask you to turn</p> <p>22 to page 2 of Exhibit 5651.</p> <p>23 Do you see the first</p> <p>24 depositor into your accounts is</p> <p>25 Mr. Donziger?</p>
<p style="text-align: right;">Page 43</p> <p>1 LAURA MILLER</p> <p>2 MR. DONZIGER: Did you ask</p> <p>3 for those in your request?</p> <p>4 MS. NEUMAN: This is ongoing</p> <p>5 discovery, Mr. Donziger. If</p> <p>6 Ms. Miller declines to provide the</p> <p>7 information, she can do that. But</p> <p>8 I've asked the question.</p> <p>9 MR. DONZIGER: Well, I don't</p> <p>10 think you need to know the name.</p> <p>11 MS. NEUMAN: I appreciate we</p> <p>12 have a difference of opinion. So the</p> <p>13 witness can either answer the</p> <p>14 question or not.</p> <p>15 MR. DONZIGER: I'm objecting</p> <p>16 to that. And I'm going to object to</p> <p>17 that on marital privilege, given the</p> <p>18 sensitivities involved in the way we</p> <p>19 spend money.</p> <p>20 So I would direct you not to</p> <p>21 give the name of your financial</p> <p>22 advisor. Just go to the next</p> <p>23 question.</p> <p>24 THE WITNESS: I agree.</p> <p>25 Q Are you choosing not to</p>	<p style="text-align: right;">Page 45</p> <p>1 LAURA MILLER</p> <p>2 A Yes.</p> <p>3 MR. DONZIGER: I'm going to</p> <p>4 object on the following grounds to</p> <p>5 questions based on this document. A:</p> <p>6 This is a Gibson, Dunn work document.</p> <p>7 Ask questions relevant to my previous</p> <p>8 objection. I have no problem with</p> <p>9 that.</p> <p>10 But let's just be clear that</p> <p>11 we have an understanding that the</p> <p>12 amounts reflected here were prepared</p> <p>13 by a Gibson, Dunn expert and are not</p> <p>14 necessarily accurate.</p> <p>15 Q Do you see in the first</p> <p>16 entry on page 2 of Exhibit 5651,</p> <p>17 Ms. Miller, that it indicates that "per</p> <p>18 our calculations, Mr. Donziger has</p> <p>19 deposited \$432,43.65 into your accounts</p> <p>20 since 5/15/2012"?</p> <p>21 A Yes.</p> <p>22 Q This is not including</p> <p>23 amounts deposited after June 11th of</p> <p>24 2018.</p> <p>25 Are you aware of any</p>

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<p style="text-align: right;">Page 46</p> <p>1 LAURA MILLER</p> <p>2 deposits that Mr. Donziger has made into</p> <p>3 your accounts since June of 2018?</p> <p>4 A He has no access to my</p> <p>5 account. He cannot deposit into my</p> <p>6 account.</p> <p>7 Q But he has transferred money</p> <p>8 into your account?</p> <p>9 A I don't know.</p> <p>10 MR. DONZIGER: You mean</p> <p>11 since that date?</p> <p>12 A Since 2018?</p> <p>13 MR. DONZIGER: Well, the</p> <p>14 question is, if you look at the last</p> <p>15 deposit, 6/11, is June 11th of last</p> <p>16 year, 2018?</p> <p>17 THE WITNESS: Yes.</p> <p>18 MR. DONZIGER: You state the</p> <p>19 question. I want to make sure it's</p> <p>20 clear to the witness.</p> <p>21 MS. NEUMAN: She already</p> <p>22 answered my question.</p> <p>23 THE WITNESS: So can I --</p> <p>24 MR. DONZIGER: No.</p> <p>25 Actually, I'm going to call for a</p>	<p style="text-align: right;">Page 48</p> <p>1 LAURA MILLER</p> <p>2 husband was a beneficiary to the Donziger</p> <p>3 Family Trust; correct?</p> <p>4 A To the best of my knowledge,</p> <p>5 yes.</p> <p>6 Q Did you ever borrow money</p> <p>7 from that trust?</p> <p>8 A No. Can I take that back?</p> <p>9 Q Sure.</p> <p>10 You can always correct</p> <p>11 something if you remember something</p> <p>12 different.</p> <p>13 A My father-in-law gave money,</p> <p>14 gave me a check for my son for his school</p> <p>15 many, many years ago.</p> <p>16 Q I take it since you were</p> <p>17 correcting the prior answer, he was</p> <p>18 treating the check as a loan as opposed</p> <p>19 to a gift?</p> <p>20 A Yes.</p> <p>21 Q Is that fair?</p> <p>22 A Yes.</p> <p>23 Q And do you remember the</p> <p>24 amount of that check?</p> <p>25 A No, I don't.</p>
<p style="text-align: right;">Page 47</p> <p>1 LAURA MILLER</p> <p>2 break. Just five minutes.</p> <p>3 MS. NEUMAN: Sure. There's</p> <p>4 no question pending.</p> <p>5 THE VIDEOGRAPHER: The time</p> <p>6 on the video monitor is 10:36 a.m.</p> <p>7 We're off the record.</p> <p>8 (A short recess was taken.)</p> <p>9 THE VIDEOGRAPHER: We are</p> <p>10 back on the record. The time on the</p> <p>11 video monitor is 10:41 a.m.</p> <p>12 Q Ms. Miller, did you have any</p> <p>13 conversations related to your deposition</p> <p>14 during the break?</p> <p>15 A Yes.</p> <p>16 Q Did you have a conversation</p> <p>17 with Mr. Donziger?</p> <p>18 A Yes.</p> <p>19 Q What was the substance of</p> <p>20 that conversation?</p> <p>21 A That I need to listen to the</p> <p>22 questions carefully.</p> <p>23 Q Anything else?</p> <p>24 A No.</p> <p>25 Q You're aware that your</p>	<p style="text-align: right;">Page 49</p> <p>1 LAURA MILLER</p> <p>2 Q I'm going to give you a</p> <p>3 document that we've marked as</p> <p>4 Exhibit 5652.</p> <p>5 (The above-referred-to</p> <p>6 document was marked as Exhibit 5652</p> <p>7 for identification, as of this date.)</p> <p>8 Q This is a consent order,</p> <p>9 terminating the trust in the estate of</p> <p>10 Leon S. Donziger.</p> <p>11 Leon S. Donziger is</p> <p>12 Mr. Donziger's grandfather?</p> <p>13 A Yes.</p> <p>14 MR. DONZIGER: If you know,</p> <p>15 if you know.</p> <p>16 A Yes.</p> <p>17 Q Are you generally aware that</p> <p>18 in 2012, Mr. Donziger received the</p> <p>19 distribution of the corpus of the trust</p> <p>20 created in the state of Leon S Donziger?</p> <p>21 A Not to my recollection, no.</p> <p>22 Q You don't recall that, one</p> <p>23 way or the other?</p> <p>24 A No.</p> <p>25 Q Can you look at page 2 of</p>

<p style="text-align: right;">Page 58</p> <p>1 LAURA MILLER</p> <p>2 being deposited.</p> <p>3 Q Do you know how they're</p> <p>4 being used if they're not being signed</p> <p>5 over to you?</p> <p>6 A Not to my knowledge, no.</p> <p>7 MR. DONZIGER: Objection to</p> <p>8 the question. It presumes a fact</p> <p>9 that may or may not be in existence,</p> <p>10 the fact being that they're just</p> <p>11 sitting out there, that they exist</p> <p>12 even. So I think that --</p> <p>13 MS. NEUMAN: By "they," you</p> <p>14 mean the checks?</p> <p>15 MR. DONZIGER: Yeah. So I</p> <p>16 think --</p> <p>17 MS. NEUMAN: I'm entitled to</p> <p>18 explore this witness's knowledge.</p> <p>19 MR. DONZIGER: That's fair.</p> <p>20 But I want everyone to be clear about</p> <p>21 her answers because it seems to me</p> <p>22 that there's a presumption in your</p> <p>23 question based on facts that haven't</p> <p>24 been proven or demonstrated to be</p> <p>25 true because this only goes up to</p>	<p style="text-align: right;">Page 60</p> <p>1 LAURA MILLER</p> <p>2 (The requested portion was</p> <p>3 read back by the court reporter.)</p> <p>4 MR. DONZIGER: I would ask</p> <p>5 you not to answer that. That's our</p> <p>6 personal stuff. She already</p> <p>7 testified that there's no budget,</p> <p>8 there's no agreement. So I would ask</p> <p>9 you not to answer that. It's very</p> <p>10 personal. And I'm asserting marital</p> <p>11 privilege.</p> <p>12 MS. NEUMAN: On a financial</p> <p>13 issue?</p> <p>14 MR. DONZIGER: Yes. That</p> <p>15 goes to our marriage.</p> <p>16 THE WITNESS: I agree.</p> <p>17 Q You're declining to answer,</p> <p>18 Ms. Miller?</p> <p>19 A I'm declining to answer.</p> <p>20 MS. NEUMAN: I'm going to</p> <p>21 mark as Exhibit 5654 a coversheet</p> <p>22 Schedule LBM-2. Attached are deposit</p> <p>23 slips from Citibank, starting with</p> <p>24 the Bates number Citi 2108.</p> <p>25 (The above-referred-to</p>
<p style="text-align: right;">Page 59</p> <p>1 LAURA MILLER</p> <p>2 March. So obviously, if she knows</p> <p>3 about other checks since March, she</p> <p>4 should answer. I think she just</p> <p>5 testified she doesn't.</p> <p>6 Q Ms. Miller, do you know</p> <p>7 whether Mr. Donziger has liquidated his</p> <p>8 interest in Argyle Knoxville since March</p> <p>9 of 2019?</p> <p>10 A I have no knowledge.</p> <p>11 Q And do you know whether he's</p> <p>12 signed over that interest in Argyle</p> <p>13 Knoxville to anyone for any purpose?</p> <p>14 A I have no knowledge.</p> <p>15 Q On a month-to-month basis on</p> <p>16 this financial issue, do you discuss with</p> <p>17 Mr. Donziger how much he's going to</p> <p>18 provide you towards expenses?</p> <p>19 A No.</p> <p>20 Q How does that work, just</p> <p>21 financially?</p> <p>22 MR. DONZIGER: Objection.</p> <p>23 I'm asserting marital privilege here.</p> <p>24 Can you read back the</p> <p>25 question?</p>	<p style="text-align: right;">Page 61</p> <p>1 LAURA MILLER</p> <p>2 document was marked as Exhibit 5654</p> <p>3 for identification, as of this date.)</p> <p>4 Q Are you familiar with</p> <p>5 Montecito Bank, Ms. Miller?</p> <p>6 A Yes.</p> <p>7 Q The deposits into your</p> <p>8 accounts from Montecito Bank, what were</p> <p>9 the source of those funds?</p> <p>10 A It was a client.</p> <p>11 Q And these are all client</p> <p>12 payments for services you performed?</p> <p>13 A Yes.</p> <p>14 MS. NEUMAN: I'm going to</p> <p>15 mark as Exhibit 5655, a Schedule</p> <p>16 LBM-4, supporting documents produced</p> <p>17 by Chase and Citibank. The first</p> <p>18 document bears the Bates number Chase</p> <p>19 BJD187.</p> <p>20 (The above-referred-to</p> <p>21 document was marked as Exhibit 5655</p> <p>22 for identification, as of this date.)</p> <p>23 Q So Exhibit 5655, Ms. Miller,</p> <p>24 relates to transfers made from</p> <p>25 Mr. Donziger's accounts into your</p>

16 (Pages 58 - 61)

<p style="text-align: right;">Page 66</p> <p>1 LAURA MILLER</p> <p>2 increase in the household expenses you've</p> <p>3 been talking about in that year?</p> <p>4 A Not to my knowledge.</p> <p>5 MS. NEUMAN: I'm going to</p> <p>6 mark as Exhibit 5656, a summary sheet</p> <p>7 we prepared.</p> <p>8 (The above-referred-to</p> <p>9 document was marked as Exhibit 5656</p> <p>10 for identification, as of this date.)</p> <p>11 MS. NEUMAN: Labeled</p> <p>12 Schedule LBM 5.1, followed by the</p> <p>13 documents produced by Citibank,</p> <p>14 starting with the Bates number Citi</p> <p>15 4607.</p> <p>16 Q These are payments made,</p> <p>17 Ms. Miller, according to Citibank's</p> <p>18 records, from your interest checking</p> <p>19 account to TD Bank. Do you see that?</p> <p>20 A Yes, I do.</p> <p>21 Q Are these payments that you</p> <p>22 were making on Mr. Donziger's TD credit</p> <p>23 card?</p> <p>24 A Yes, they are.</p> <p>25 Q Is that a credit card that</p>	<p style="text-align: right;">Page 68</p> <p>1 LAURA MILLER</p> <p>2 A To my knowledge, he did,</p> <p>3 yes.</p> <p>4 Q At this time, 2018 to 2019?</p> <p>5 A Yes.</p> <p>6 Q But his Citibank credit card</p> <p>7 is separate and a separate number from</p> <p>8 your Citibank credit card; is that right?</p> <p>9 A Yes, absolutely.</p> <p>10 Q Do you know when he first</p> <p>11 obtained the Citibank credit card?</p> <p>12 A I have no knowledge.</p> <p>13 Q But to the extent he's</p> <p>14 currently making payments on that card,</p> <p>15 they're being made from your account?</p> <p>16 A Yes. Can I just add</p> <p>17 something?</p> <p>18 MR. DONZIGER: No. Let me</p> <p>19 just object to --</p> <p>20 Q My answer to that is, yes,</p> <p>21 you can add anything you want to add.</p> <p>22 What did you want to add?</p> <p>23 A I want to add that his</p> <p>24 accounts are frozen. So I'm responsible</p> <p>25 for paying bills, everything. That's</p>
<p style="text-align: right;">Page 67</p> <p>1 LAURA MILLER</p> <p>2 Mr. Donziger still has, to your</p> <p>3 knowledge?</p> <p>4 A To my knowledge, yes.</p> <p>5 Q And do you continue to make</p> <p>6 payments on it from your account?</p> <p>7 A Yes, I do.</p> <p>8 MS. NEUMAN: I'm going to</p> <p>9 show the witness a document I'm going</p> <p>10 to mark as 5657. The first page is a</p> <p>11 schedule recreated, labeled Schedule</p> <p>12 LBM 5.2. The backup Citibank</p> <p>13 documents are attached, starting with</p> <p>14 the Bates Number 4607.</p> <p>15 (The above-referred-to</p> <p>16 document was marked as Exhibit 5657</p> <p>17 for identification, as of this date.)</p> <p>18 Q Ms. Miller, Exhibit 5657 are</p> <p>19 payments from your Citibank account to</p> <p>20 something called Citibank payment.</p> <p>21 Do you know what that is?</p> <p>22 A I'm assuming this is what I</p> <p>23 paid statements credit card.</p> <p>24 Q Does Mr. Donziger have a</p> <p>25 Citibank credit card, to your knowledge?</p>	<p style="text-align: right;">Page 69</p> <p>1 LAURA MILLER</p> <p>2 all.</p> <p>3 MR. DONZIGER: No objection.</p> <p>4 Q I'm going to ask you some</p> <p>5 questions about a loan that you indicated</p> <p>6 you received from George Waters.</p> <p>7 A Okay.</p> <p>8 Q When did you first meet</p> <p>9 Mr. Waters?</p> <p>10 MR. DONZIGER: Objection.</p> <p>11 Assumes fact not in evidence. Just</p> <p>12 rephrase, please.</p> <p>13 Q You can answer the question.</p> <p>14 A I'm objecting.</p> <p>15 Q You're objecting?</p> <p>16 A I agree.</p> <p>17 Q So you're refusing to</p> <p>18 answer? I just need to clarify that for</p> <p>19 the record.</p> <p>20 MR. DONZIGER: Maybe ask if</p> <p>21 she's ever met George Waters. Start</p> <p>22 with that question.</p> <p>23 MS. NEUMAN: When you</p> <p>24 question her, you can do it however</p> <p>25 you want.</p>

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1 LAURA MILLER
2 Q Ms. Miller, there are
3 deposits into your accounts from a
4 Fidelity Brokerage Services account.
5 Are you familiar with that
6 account?
7 A Yes, I am.
8 Q Whose account is the
9 Fidelity Brokerage?
10 A My deceased father.
11 Q Is that account, the
12 Fidelity Brokerage Services account, an
13 account to which Mr. Donziger has any
14 access?
15 A No.
16 Q And is it an account into
17 which you or he have ever transferred any
18 money?
19 A No.
20 Q So it's just an account from
21 which you receive money?
22 A Yes.
23 Q And the source of all the
24 money in that account is your parents; is
25 that right?

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1 LAURA MILLER
2 A Yes.
3 MS. NEUMAN: Go off the
4 record for about five minutes.
5 THE VIDEOGRAPHER: The time
6 on the video monitor is 11:19 a.m.
7 We're off the record. This ends
8 Media 1.
9 (A short recess was taken.)
10 THE VIDEOGRAPHER: We are
11 back on the record. The time on the
12 video monitor is 11:37 a.m. This
13 starts Media 2.
14 MS. NEUMAN: Mr. Donziger, I
15 neglected to note at the beginning of
16 the deposition, we've noted in prior
17 discussions that you've taken
18 pictures of people without their
19 consent.
20 So we ask you not to do
21 that. If you need to take a picture
22 of someone, you need to ask their
23 consent.
24 MR. DONZIGER: Can I take a
25 picture of you?

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1 LAURA MILLER
2 MS. NEUMAN: No.
3 Q Ms. Miller, did you have any
4 conversations related to your depo during
5 the break?
6 A We just discussed that I
7 need to take it slow.
8 Q With Mr. Donziger?
9 A Yes.
10 Q I'll ask you some questions
11 about electronics.
12 So in your household
13 currently, how many computers are there?
14 A Three.
15 Q And who do they belong to?
16 A Steven has one, I have one,
17 and our son has one.
18 Q Does Mr. Donziger have any
19 access to your computer?
20 A No.
21 Q Does he have any access to
22 your son's computer?
23 A No.
24 Q You've never seen him use
25 your computer or your son's computer?

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1 LAURA MILLER
2 A No.
3 Q The computer that you have,
4 was that a computer that you purchased?
5 A Yes.
6 Q And the computer that your
7 son has, who purchased that?
8 A I don't recall.
9 Q The computer that
10 Mr. Donziger has, do you know what kind
11 of computer it is?
12 A I think it's an Apple. I'm
13 not sure what kind.
14 Q Do you ever use that
15 computer?
16 A No.
17 Q Never?
18 A No.
19 Q In terms of iPads, do you
20 have any iPads in your apartment?
21 A We used to. But we don't
22 any longer.
23 Q How many did you used to
24 have?
25 A One.

<p style="text-align: right;">Page 102</p> <p>1 LAURA MILLER</p> <p>2 me.</p> <p>3 A Mm-hmm.</p> <p>4 Q Were you on the</p> <p>5 Denver-Colorado trip?</p> <p>6 A No.</p> <p>7 Q The Washington, D.C. trip?</p> <p>8 A No.</p> <p>9 Q The May 2016 Amelia Island?</p> <p>10 A Yes.</p> <p>11 Q Was anyone other than</p> <p>12 yourself and Mr. Donziger on that trip or</p> <p>13 your son?</p> <p>14 A Our son. That's it.</p> <p>15 Q No one else?</p> <p>16 A No.</p> <p>17 Q Did that trip have any</p> <p>18 business purpose that you're aware of?</p> <p>19 A No.</p> <p>20 Q The Washington, D.C. trip in</p> <p>21 June, were you involved in that?</p> <p>22 A In June, no.</p> <p>23 Q On page 3, the August trip</p> <p>24 to Portugal, were you involved in that?</p> <p>25 MR. DONZIGER: I'm going to</p>	<p style="text-align: right;">Page 104</p> <p>1 LAURA MILLER</p> <p>2 way to business?</p> <p>3 A No.</p> <p>4 Q That you're aware of?</p> <p>5 A It did not relate to any</p> <p>6 business.</p> <p>7 Q Was there any non-family</p> <p>8 members with you on that trip?</p> <p>9 MR. DONZIGER: Objection.</p> <p>10 This is marital privilege.</p> <p>11 A Okay.</p> <p>12 Q What was your answer?</p> <p>13 A It's marital privilege. I</p> <p>14 agree. This is -- it was a family</p> <p>15 vacation.</p> <p>16 MR. DONZIGER: Listen, it's</p> <p>17 a marital privilege. I'm asserting</p> <p>18 marital privilege.</p> <p>19 A Okay. I'm asserting marital</p> <p>20 privilege for me.</p> <p>21 MR. DONZIGER: Do not</p> <p>22 answers the questions as long as I'm</p> <p>23 asserting marital privilege.</p> <p>24 MS. NEUMAN: Mr. Donziger,</p> <p>25 you can't properly instruct the</p>
<p style="text-align: right;">Page 103</p> <p>1 LAURA MILLER</p> <p>2 object. I'm going to assert marital</p> <p>3 privilege over the rest of this,</p> <p>4 unless you can actually figure out</p> <p>5 some nexus between a trip and my</p> <p>6 assets or money. She's already</p> <p>7 testified she was not involved in</p> <p>8 investor activity as a general</p> <p>9 matter. And I just think this is</p> <p>10 redundant and harassing.</p> <p>11 So I'm asserting marital</p> <p>12 privilege. If you feel like out of</p> <p>13 all these things remaining you can</p> <p>14 find something that really hones in</p> <p>15 on what you're properly entitled to</p> <p>16 question her about, please do so.</p> <p>17 But if you're going to go</p> <p>18 through this generally, I'm going to</p> <p>19 assert marital privilege and ask the</p> <p>20 witness to please respect my marital</p> <p>21 privilege and not answer.</p> <p>22 Q The August trip to Portugal,</p> <p>23 were you involved in that trip?</p> <p>24 A Yes.</p> <p>25 Q Did that trip relate in any</p>	<p style="text-align: right;">Page 105</p> <p>1 LAURA MILLER</p> <p>2 witness not to answer. I'll state</p> <p>3 that for the record.</p> <p>4 MR. DONZIGER: Okay. But</p> <p>5 I'm asking her to respect my marital</p> <p>6 privilege.</p> <p>7 A I respect it. Okay.</p> <p>8 Q On any of the trips that</p> <p>9 you've taken abroad with Mr. Donziger</p> <p>10 since 2014, has he taken any devices and</p> <p>11 left them in any foreign location?</p> <p>12 MR. DONZIGER: That's fine.</p> <p>13 You can ask that question. But I</p> <p>14 object to the phrasing of the</p> <p>15 question. If you know, lay a</p> <p>16 foundation, if you know, has he taken</p> <p>17 devices.</p> <p>18 MS. NEUMAN: You have to put</p> <p>19 if you know in front of a witness.</p> <p>20 It's obviously based on their</p> <p>21 personal knowledge. You can ask</p> <p>22 other questions if you think some of</p> <p>23 my questions need clarifying.</p> <p>24 Can you read the question</p> <p>25 back to the witness, please?</p>

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1 LAURA MILLER
 2 (The requested portion was
 3 read back by the court reporter.)
 4 A He lost his phone last --
 5 last August.
 6 Q In what location?
 7 A In France.
 8 Q In any trip that you've been
 9 on with Mr. Donziger since 2014, has he
 10 taken any money or other assets with him
 11 and deposited it in a foreign location or
 12 left it?
 13 A Not to my knowledge.
 14 Q Other than the trip to
 15 Portugal, were you involved in any of the
 16 other trips shown on page 3?
 17 A No.
 18 Q Looking at page 4 of Exhibit
 19 5660, can you take a minute to read each
 20 of those dates and locations and let me
 21 know if you were involved in any of those
 22 trips?
 23 MR. DONZIGER: I'm going to
 24 object. I mean first of all, the
 25 time frame of these trips, 2016, was

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1 LAURA MILLER
 2 prior to the entrance of the
 3 judgment.
 4 MS. NEUMAN: Again, he's
 5 already ruled on the relevant time
 6 frame which is not the date of the
 7 money judgment.
 8 Q I see you're jumping ahead.
 9 A No. It's pretty obvious.
 10 It's a school vacation in December.
 11 Q Were you involved in any of
 12 the other trips?
 13 A No.
 14 Q On page 5, can you read the
 15 dates and locations and let me know if
 16 you participated in any of those trips?
 17 A February 17th to the 21st, I
 18 was with Steven and my son.
 19 Q In Ecuador?
 20 A No. In Savannah, Georgia.
 21 Q And did that trip have any
 22 business purpose, to your knowledge?
 23 A No.
 24 Q Were you involved in any of
 25 the other trips?

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1 LAURA MILLER
 2 A No.
 3 Q The trips on page 6, did you
 4 have any involvement in any of those
 5 trips?
 6 A May 28th to 30th in
 7 Jacksonville, Florida.
 8 Q Did that trip have any
 9 business purpose that you're aware of?
 10 A No business purpose.
 11 Q As to the trips that you
 12 weren't involved in, do you have any
 13 knowledge about the purposes of those
 14 trips?
 15 A No.
 16 Q On page 7, there's six trips
 17 shown.
 18 Were you involved in any of
 19 the trips?
 20 A Yes, I was. The June 27th
 21 to July 5th trip, the July 8th to 10th
 22 trip and the July 27th to August 3rd
 23 trip.
 24 Q Did any of those trips have
 25 any business purpose that you're aware

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1 LAURA MILLER
 2 of?
 3 A No.
 4 MR. DONZIGER: I'm going to
 5 ask for a break.
 6 MS. NEUMAN: Okay. Go off
 7 the record.
 8 THE VIDEOGRAPHER: The time
 9 on the video monitor is 12:08 p.m.
 10 We're off the record.
 11 (A short recess was taken.)
 12 THE VIDEOGRAPHER: We are
 13 back on the record. The time on the
 14 video monitor is 12:12 p.m.
 15 Q Ms. Miller, did you have any
 16 conversations related to your depo during
 17 the break?
 18 A Yes. I'm reading too fast.
 19 And I made a mistake.
 20 Q And do you want to correct
 21 something?
 22 A Yes. In Deauville, Steven
 23 did have some meetings. I was not
 24 involved with them.
 25 Q You're referring to the trip

<p style="text-align: right;">Page 122</p> <p>1 LAURA MILLER</p> <p>2 the funds for Mr. Donziger's travels?</p> <p>3 A No. Not to my knowledge,</p> <p>4 no.</p> <p>5 Q Do you ever pay for his</p> <p>6 travel expenses out of your accounts for</p> <p>7 non-family trips?</p> <p>8 A No.</p> <p>9 Q Since 2012, what have been</p> <p>10 Mr. Donziger's sources of income, to your</p> <p>11 knowledge?</p> <p>12 A Just the work that he does</p> <p>13 on the case. Since 2012, outside</p> <p>14 clients, other clients he's had.</p> <p>15 Q What's your understanding as</p> <p>16 to Mr. Donziger's other clients in that</p> <p>17 time frame?</p> <p>18 MR. DONZIGER: Objection.</p> <p>19 Sorry. It has nothing to do with</p> <p>20 Ecuador.</p> <p>21 MS. CHAMPION: It has to do</p> <p>22 with income.</p> <p>23 MR. DONZIGER: In 2012? I</p> <p>24 don't think so.</p> <p>25 Q That is the relevant time</p>	<p style="text-align: right;">Page 124</p> <p>1 LAURA MILLER</p> <p>2 on the video monitor is 12:29 p.m.</p> <p>3 We're off the record.</p> <p>4 (A lunch recess was taken.)</p> <p>5 THE VIDEOGRAPHER: We are</p> <p>6 back on the record. The time on the</p> <p>7 video monitor is 1:35 p.m. This</p> <p>8 starts Media 3.</p> <p>9 Q Good afternoon, Ms. Moral.</p> <p>10 A Hi.</p> <p>11 Q You understand you're still</p> <p>12 under oath?</p> <p>13 A Yes.</p> <p>14 Q Did you have any discussions</p> <p>15 over the lunch break related to your</p> <p>16 deposition testimony?</p> <p>17 A Just what I had said before.</p> <p>18 I have to read carefully, continue to</p> <p>19 tell the truth.</p> <p>20 Q More lecturing?</p> <p>21 A Yes.</p> <p>22 Q So I wanted to do a few</p> <p>23 follow-up questions related to phones.</p> <p>24 A Okay.</p> <p>25 Q You testified earlier that</p>
<p style="text-align: right;">Page 123</p> <p>1 LAURA MILLER</p> <p>2 frame.</p> <p>3 Are you declining to answer?</p> <p>4 A I'm declining to answer.</p> <p>5 Q Without regard to their</p> <p>6 identities, which you declined to</p> <p>7 provide, do you know the amount of income</p> <p>8 Mr. Donziger has made from non-Ecuador</p> <p>9 clients since 2012?</p> <p>10 A I have no knowledge.</p> <p>11 Q Other than legal work that</p> <p>12 he's performed for clients, are you aware</p> <p>13 of any other sources of income from</p> <p>14 Mr. Donziger since 2012?</p> <p>15 A I have no knowledge.</p> <p>16 Q Do you have any knowledge as</p> <p>17 to whether Mr. Donziger is currently</p> <p>18 financially able to pay the judgments</p> <p>19 against him?</p> <p>20 A I have no knowledge.</p> <p>21 Q Has he discussed with you</p> <p>22 why he has not paid those judgments?</p> <p>23 A As far as I know, they were</p> <p>24 under appeal, no. I have no knowledge.</p> <p>25 THE VIDEOGRAPHER: The time</p>	<p style="text-align: right;">Page 125</p> <p>1 LAURA MILLER</p> <p>2 your son's number was (929)392-4656?</p> <p>3 A Can I check?</p> <p>4 Q Sure.</p> <p>5 Well, my question is going</p> <p>6 to be, has he ever had any other phone</p> <p>7 numbers?</p> <p>8 A No.</p> <p>9 Q Do you want to check if that</p> <p>10 number's right?</p> <p>11 A Yes. His number is</p> <p>12 (929)392-4656?</p> <p>13 Q Yes. That's the one you</p> <p>14 gave earlier.</p> <p>15 A Okay.</p> <p>16 Q And that's the only phone</p> <p>17 he's ever had?</p> <p>18 A Yes.</p> <p>19 Q Earlier, you also mentioned</p> <p>20 giving an old phone to a nanny?</p> <p>21 A Yeah.</p> <p>22 Q And I wanted to clarify.</p> <p>23 Did you just give her the</p> <p>24 physical phone or did you get her cell</p> <p>25 phone account?</p>

<p style="text-align: right;">Page 126</p> <p>1 LAURA MILLER</p> <p>2 A No. I just gave her the</p> <p>3 physical phone. Can I clarify something?</p> <p>4 Q Sure.</p> <p>5 A Okay. Sometimes -- and</p> <p>6 we've never used them -- when you get the</p> <p>7 phones, sometimes you'll get like a</p> <p>8 little video thing with your phone, like</p> <p>9 a gift or something. Do you ever get</p> <p>10 those? I forget what they're called. I</p> <p>11 don't even know. Like a minipad or</p> <p>12 something. We never use them.</p> <p>13 But I'm just wondering if</p> <p>14 some of those numbers might be connected</p> <p>15 with it. I just don't know what all</p> <p>16 those numbers are. I'm just trying to</p> <p>17 figure out where they all are from.</p> <p>18 Q I'm not familiar with what</p> <p>19 you're referring to.</p> <p>20 Can you describe it?</p> <p>21 A I don't want to say it's</p> <p>22 like an iPad. But it's like an iPad.</p> <p>23 But it's not through Apple or anything</p> <p>24 like that. I don't know.</p> <p>25 Q Do you have a landline in</p>	<p style="text-align: right;">Page 128</p> <p>1 LAURA MILLER</p> <p>2 A No.</p> <p>3 Q I'll give you a picture of a</p> <p>4 BlackBerry which I've marked as</p> <p>5 Exhibit 5662.</p> <p>6 (The above-referred-to</p> <p>7 document was marked as Exhibit 5662</p> <p>8 for identification, as of this date.)</p> <p>9 Q Have you ever seen</p> <p>10 Mr. Donziger use a phone like this?</p> <p>11 A When we were first married,</p> <p>12 yes, 13 years ago or so.</p> <p>13 Q And since then?</p> <p>14 A No.</p> <p>15 MS. NEUMAN: I'm going to</p> <p>16 mark as 5663, a picture of an AT&T</p> <p>17 phone.</p> <p>18 (The above-referred-to</p> <p>19 document was marked as Exhibit 5663</p> <p>20 for identification, as of this date.)</p> <p>21 Q Have you ever seen</p> <p>22 Mr. Donziger use a phone like</p> <p>23 Exhibit 5663?</p> <p>24 A Not to my recollection.</p> <p>25 Q The loan that you got</p>
<p style="text-align: right;">Page 127</p> <p>1 LAURA MILLER</p> <p>2 your apartment?</p> <p>3 A No. We used to years ago</p> <p>4 but not anymore.</p> <p>5 Q Do you know when you stopped</p> <p>6 having a landline?</p> <p>7 A Probably at least four years</p> <p>8 ago or so, five years ago. I don't even</p> <p>9 remember.</p> <p>10 MS. NEUMAN: I'm going to</p> <p>11 mark as Exhibit 5661, a picture of a</p> <p>12 Nokia 2610 phone.</p> <p>13 (The above-referred-to</p> <p>14 document was marked as Exhibit 5661</p> <p>15 for identification, as of this date.)</p> <p>16 Q Have you ever seen</p> <p>17 Mr. Donziger use a phone that looks like</p> <p>18 that?</p> <p>19 A I have no recollection.</p> <p>20 MR. DONZIGER: Objection.</p> <p>21 Can you give some sort of time frame</p> <p>22 or just forever and forever since</p> <p>23 we've known each other?</p> <p>24 Q Since 2012, have you ever</p> <p>25 seen him use a phone like that?</p>	<p style="text-align: right;">Page 129</p> <p>1 LAURA MILLER</p> <p>2 Mr. Waters, did you discuss with</p> <p>3 Mr. Donziger why you were signing the</p> <p>4 loan documents as opposed to him?</p> <p>5 A We discussed it, yes.</p> <p>6 Q And what was the reason the</p> <p>7 loan was being made to you instead of</p> <p>8 Mr. Donziger?</p> <p>9 A Because I am now the one</p> <p>10 who's financially responsible to pay all</p> <p>11 the bills for our family and to keep our</p> <p>12 family alive. And he -- he knew this.</p> <p>13 So he sent it to me.</p> <p>14 Q And you've taken on that</p> <p>15 responsibility because of the judgments</p> <p>16 against Mr. Donziger or for some other</p> <p>17 reason?</p> <p>18 A Because his accounts are</p> <p>19 frozen.</p> <p>20 Q Is it your understanding</p> <p>21 that he can't open new accounts or just</p> <p>22 that he hasn't or do you have an</p> <p>23 understanding?</p> <p>24 MR. DONZIGER: Objection.</p> <p>25 Please move on. That calls for</p>

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1 LAURA MILLER
2 speculation.
3 Q You can answer.
4 A I agree with the objection.
5 Q So you're declining to
6 answer?
7 A I'm declining to answer,
8 yes.
9 MS. NEUMAN: I'm going to
10 hand the witness a document that I'm
11 marking as Exhibit 5600, the subpoena
12 that was served on you in this
13 matter.
14 Q I want to turn to -- let me
15 ask you first.
16 Did you read this document
17 when you received it?
18 A Yes.
19 Q And prior to receiving this
20 document, had you previously read the
21 court's judgment from the RICO case?
22 A No, I had not.
23 Q Did you receive any advice
24 regarding responding to the subpoena from
25 anyone other than Mr. Donziger?

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1 LAURA MILLER
2 A Yes, I had.
3 Q Was that advice from legal
4 counsel or someone else?
5 A Not legal counsel that I
6 retained.
7 Q But legal counsel that you
8 consulted other than Mr. Donziger?
9 A Yes.
10 Q And who would that have
11 been?
12 A Aaron Page.
13 Q And you didn't retain
14 Mr. Page to give you advice, but you
15 discussed the subpoena with him; is that
16 fair?
17 A Yes.
18 Q So if we look at page 18,
19 numbered 18, I don't think it's literally
20 18, Question 24, do you have
21 communications independent from
22 Ecuador-related communications with any
23 of the persons listed?
24 MR. DONZIGER: Objection or
25 clarification. You mean

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1 LAURA MILLER
2 communications unrelated to Ecuador
3 with these people or related to
4 Ecuador? Because I thought you just
5 said -- maybe I misunderstood --
6 unrelated to Ecuador.
7 MS. NEUMAN: Right. So that
8 we can establish.
9 MR. DONZIGER: Okay. That's
10 fine. I just wanted to be clear.
11 A When you say
12 "communications," e-mail communications?
13 Q Yes.
14 Would you rather do them one
15 by one?
16 A I don't know most of them.
17 I don't know.
18 MR. DONZIGER: Respond to
19 questions. Go ahead.
20 A Can I ask you a question?
21 So this is non-Ecuador-related?
22 Q I'll ask a new question so
23 we'll be more on the same page. How
24 about that?
25 A Sure.

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1 LAURA MILLER
2 Q So of the people listed
3 under 24, can you identify the ones for
4 me who you actually know?
5 A Who I know? Okay. I know
6 Juan Aulestia, Ben Barnes, Cliff Eisler,
7 I know Phil Fontaine, I know Richard
8 Friedman, I know Peter Grant, I know
9 Karen Hinton, I know Glenn Krevlin, I
10 know John van Merkensteijn, I know
11 Cristina Munoz, and I know Aaron Page.
12 Q There's a few more on the
13 next page.
14 A I know John Phillips, I know
15 Patricio and Augustin Salazar, I know
16 David Sherman, I know Susan Sherman, I
17 know Anton, I know Roger Waters, I know
18 Ian Watson, and I know Luis Yanza.
19 Q Other than Mr. Rogers, who
20 you indicated earlier you had never met,
21 are there any other people that you
22 indicated you know but haven't met?
23 A I know of but just through,
24 you know, conversation or something. But
25 I've never met them. I mean I've heard

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1 LAURA MILLER
2 just CC'd on it. I just don't have it.
3 So I was worried about that. You kept
4 asking in every single subpoena, this one
5 specific e-mail that Katie put me on.
6 And I don't have it. That's all. And I
7 was worried about that. So I spoke to
8 Aaron. And he said they obviously have
9 it.
10 Q I'm going to show you a
11 document that was marked as Exhibit 9 in
12 Ms. Sullivan's deposition.
13 Is this the e-mail you're
14 talking about?
15 A I guess so.
16 MR. DONZIGER: No I guess
17 so. If you don't know, just say I
18 don't know.
19 THE WITNESS: I don't.
20 MR. DONZIGER: I think, if I
21 may --
22 MS. NEUMAN: It's not going
23 to be a speaking objection?
24 MR. DONZIGER: No. I'm
25 trying to be helpful. I think -- in

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1 LAURA MILLER
2 your correspondence with Ms. Miller,
3 you kept saying she had not produced
4 an e-mail related to Katie Sullivan.
5 And I don't think it's this e-mail.
6 THE WITNESS: It's not that
7 e-mail, I don't think, because it was
8 from Katie, not Aaron.
9 Q Well, if you look at the
10 last page, next-to-last page of Exhibit 9
11 to Sullivan with the Document Number
12 MKS93, do you have that page in front of
13 you?
14 A Yes.
15 Q You see the original e-mail
16 on this chain was from Katie Sullivan?
17 A Yeah. You kept asking about
18 it. I don't have it.
19 Q You'll see on the first page
20 of this exhibit -- well, let's turn to
21 the second page.
22 Mr. Grant writes, "I give
23 you very best wishes on this and will now
24 delete all e-mails relating to this. I
25 recommend others do as well after what I

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1 LAURA MILLER
2 saw the opposition acquired." Do you see
3 that?
4 A Yes.
5 Q Do you recall getting that
6 e-mail?
7 A I can't recall.
8 Q Then Mr. Donziger
9 responds, "I second that. Please delete
10 all e-mails related to this. And again,
11 keep this info confidential." Do you see
12 that? The bottom of the first page.
13 A I see that.
14 MR. DONZIGER: Are you
15 trying to refresh her recollection
16 about this e-mail? Because she said
17 she doesn't remember.
18 A I don't have it. I don't
19 recall it. I don't have it. And I don't
20 recall it. You kept asking for it. And
21 that's why I was like, I did not see it
22 anywhere.
23 Q I understand that.
24 A Okay.
25 Q I'm just noting to you that

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1 LAURA MILLER
2 you were requested in this chain to
3 delete it.
4 My follow-up question is, do
5 you recall deleting it in response?
6 A I don't recall.
7 Q You don't recall, one way or
8 the other?
9 A No.
10 Q But you have searched for
11 it, in particular, and have been unable
12 to find it?
13 A Yes.
14 Q Could you rule out the
15 possibility that you deleted it?
16 A I can't rule out the
17 possibility. But I don't recall this at
18 all.
19 Q Do you recall deleting other
20 e-mails that related to investments or
21 potential investments in the Ecuador
22 judgment?
23 A I have never been given an
24 e-mail about investments or potential
25 investments. I'm not -- I'm not part of

<p style="text-align: right;">Page 150</p> <p>1 LAURA MILLER</p> <p>2 it. I am not a part of this. This is</p> <p>3 getting crazy.</p> <p>4 Q So in terms of your</p> <p>5 consultation with Mr. Page, is that a</p> <p>6 consultation -- you mentioned you don't</p> <p>7 have a formal retainer with him; correct?</p> <p>8 A Correct.</p> <p>9 Q Did you ever pay him for his</p> <p>10 advice?</p> <p>11 A No.</p> <p>12 Q Did he ever bill you for his</p> <p>13 advice?</p> <p>14 A No.</p> <p>15 Q Did he ever discuss the</p> <p>16 topic of conflicts with you before he</p> <p>17 gave you advice?</p> <p>18 A Could you explain a little</p> <p>19 bit more?</p> <p>20 Q Did he ever tell you that he</p> <p>21 represents Mr. Donziger?</p> <p>22 A Yes, he did.</p> <p>23 Q And did he ever say anything</p> <p>24 to you about the fact that he might have</p> <p>25 a conflict with giving you advice since</p>	<p style="text-align: right;">Page 152</p> <p>1 LAURA MILLER</p> <p>2 THE VIDEOGRAPHER: We are</p> <p>3 back on the record. The time on the</p> <p>4 video monitor is 2:15 p.m.</p> <p>5 Q Ms. Miller, did you have any</p> <p>6 conversations related to your depo during</p> <p>7 the break?</p> <p>8 A Yes. Same as we talked</p> <p>9 about before.</p> <p>10 Q Did you have any discussions</p> <p>11 related to substantive answers as opposed</p> <p>12 to your testifying method?</p> <p>13 A No.</p> <p>14 Q Now, you mentioned a couple</p> <p>15 of times during the day that you sort of</p> <p>16 changed the way that you do your finances</p> <p>17 because Mr. Donziger's accounts were</p> <p>18 frozen?</p> <p>19 A Mm-hmm.</p> <p>20 Q Was it or is it your</p> <p>21 understanding that the accounts were</p> <p>22 frozen because Chevron was trying to</p> <p>23 collect the money that was owed on the</p> <p>24 judgment it has against Mr. Donziger?</p> <p>25 MR. DONZIGER: I'm going to</p>
<p style="text-align: right;">Page 151</p> <p>1 LAURA MILLER</p> <p>2 he already represents Mr. Donziger?</p> <p>3 A Not that I recall.</p> <p>4 Q Do you know if Mr. Page and</p> <p>5 Mr. Donziger discussed any of the advice</p> <p>6 that Mr. Page would give you?</p> <p>7 MR. DONZIGER: That was a</p> <p>8 complicated question.</p> <p>9 Can you read it back?</p> <p>10 (The requested portion was</p> <p>11 read back by the court reporter.)</p> <p>12 A They discussed that this was</p> <p>13 happening and that I was going in there.</p> <p>14 And that was about all I was privy to.</p> <p>15 MR. DONZIGER: I need to</p> <p>16 take a quick break. Do you have a</p> <p>17 lot more questions? Is there a</p> <p>18 natural break coming up?</p> <p>19 MS. NEUMAN: We can take a</p> <p>20 break now. There's no pending</p> <p>21 question.</p> <p>22 THE VIDEOGRAPHER: The time</p> <p>23 on the video monitor is 2:05 p.m. We</p> <p>24 are off the record.</p> <p>25 (A short recess was taken.)</p>	<p style="text-align: right;">Page 153</p> <p>1 LAURA MILLER</p> <p>2 object.</p> <p>3 A I'm not really sure how to</p> <p>4 answer that.</p> <p>5 MR. DONZIGER: Why does that</p> <p>6 matter? She testified --</p> <p>7 MS. NEUMAN: I'm not going</p> <p>8 to discuss this with you,</p> <p>9 Mr. Donziger.</p> <p>10 MR. DONZIGER: Well, it's</p> <p>11 relevant because we have a time</p> <p>12 limitation. And this deposition has</p> <p>13 gone on a lot of hours now. The</p> <p>14 question is this -- she's already</p> <p>15 testified that she knew that the</p> <p>16 accounts were frozen. And that was</p> <p>17 the reason why she was --</p> <p>18 MS. NEUMAN: I'm asking her</p> <p>19 a different question.</p> <p>20 MR. DONZIGER: But what does</p> <p>21 it matter --</p> <p>22 MS. NEUMAN: I'm not going</p> <p>23 to discuss with you why I want to ask</p> <p>24 a certain question.</p> <p>25 MR. DONZIGER: Let's move</p>

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1 LAURA MILLER
2 on. I'm going to assert privilege.
3 Don't answer that.
4 THE WITNESS: I agree.
5 Q You're refusing to answer
6 your understanding as to why the accounts
7 are frozen?
8 MR. DONZIGER: It's totally
9 irrelevant. Get back to the
10 essence --
11 MS. NEUMAN: Mr. Donziger,
12 these are relevant questions. I'm
13 going to ask you not to make speaking
14 objections.
15 A I don't know.
16 Q Let's go back to the issue
17 of your production. So I'm going to mark
18 as Exhibit 5664, a document bearing the
19 Bates numbers LB Miller 169.
20 (The above-referred-to
21 document was marked as Exhibit 5664
22 for identification, as of this date.)
23 Q Is that a document you
24 produced, Ms. Miller?
25 A Yes. I did by mistake.

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1 LAURA MILLER
2 Q Whose handwriting is on the
3 document?
4 A Mine.
5 Q The notes that say "don't
6 produce, not relevant to the case"?
7 A This got into the pile by
8 mistake. It's not relevant.
9 Q And who made that
10 determination?
11 A I did. I realized that this
12 has nothing to do with -- what you're
13 asking for. And it's irrelevant.
14 Q What is the reference on
15 Exhibit 5664 to the Peter Grant e-mail?
16 A I was making notes. This
17 was why it was a scrap paper to me. And
18 it should not have gotten in the pile.
19 It was my own.
20 Q Different question.
21 A Okay.
22 Q What is your note to
23 yourself that says "Peter Grant e-mail"
24 about?
25 A I can't even remember.

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1 LAURA MILLER
2 Q You don't recall?
3 A No.
4 Q Did the attachment -- and
5 you didn't produce the attachment to this
6 e-mail?
7 A No, because it was
8 irrelevant.
9 Q Is the Bill being referred
10 to a Bill Guttentag?
11 MR. DONZIGER: Objection.
12 She said she would not have produced
13 it. And I would ask that you respect
14 that and ask questions about
15 something else. If you disagree with
16 that, we could litigate.
17 MS. NEUMAN: I disagree with
18 that.
19 Q Can you answer the question,
20 please?
21 MR. DONZIGER: Don't answer
22 the question.
23 A I'm not going to answer the
24 question. I'm not answering it. It's
25 irrelevant.

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1 LAURA MILLER
2 MR. DONZIGER: I need to
3 correct something for the record. My
4 last direction to Ms. Miller might
5 make it appear like I think I'm
6 representing her. I want to
7 reiterate that I'm not her lawyer. I
8 do -- it is my position that marital
9 privilege entitles me when I assert
10 it to direct her not to answer a
11 question if I assert it on behalf of
12 myself and if she doesn't assert it
13 on behalf of herself. So that was
14 the basis for my direction to not
15 answer the question.
16 MS. NEUMAN: I'm going to
17 hand the witness a document we've
18 marked as Exhibit 5665, bearing the
19 Bates numbers GKrevlin 294 through
20 299.
21 (The above-referred-to
22 document was marked as Exhibit 5665
23 for identification, as of this date.)
24 Q Ms. Miller, is this the
25 attachment -- although produced by a

<p style="text-align: right;">Page 166</p> <p>1 LAURA MILLER</p> <p>2 Q In response to Question 19</p> <p>3 about domestic assets that Mr. Donziger</p> <p>4 owns --</p> <p>5 A I have no knowledge.</p> <p>6 Q -- this would include your</p> <p>7 apartment which you have told us about</p> <p>8 separately. But since you didn't put it</p> <p>9 here, how are you interpreting asset?</p> <p>10 Because it's meant, quite broadly, money,</p> <p>11 property, art, jewelry, coin collections.</p> <p>12 A The only thing we own</p> <p>13 together is the apartment which I</p> <p>14 actually own more of the apartment than</p> <p>15 he does.</p> <p>16 Q Can you explain that to me?</p> <p>17 A I put down a larger deposit</p> <p>18 than he did when we initially bought the</p> <p>19 apartment.</p> <p>20 Q And how much did you put</p> <p>21 down versus how much he put down?</p> <p>22 A I think I put down like</p> <p>23 \$100,000 more. He put down 200,000. And</p> <p>24 I put down 300.</p> <p>25 Q And how does that impact</p>	<p style="text-align: right;">Page 168</p> <p>1 LAURA MILLER</p> <p>2 previously marked as Exhibit 5435, a</p> <p>3 declaration of John Slavek, Docket</p> <p>4 No. 2115.</p> <p>5 Q Have you seen this document</p> <p>6 before, Ms. Miller?</p> <p>7 A Yes.</p> <p>8 Q Can you turn with me to the</p> <p>9 first tabbed page.</p> <p>10 This lists persons known to</p> <p>11 have invested in the judgment since the</p> <p>12 RICO case judgment was issued. Did that</p> <p>13 make sense to you?</p> <p>14 A Yes.</p> <p>15 Q Do you know of investors in</p> <p>16 the judgment since RICO that aren't</p> <p>17 listed here?</p> <p>18 A I have no knowledge of any,</p> <p>19 no knowledge.</p> <p>20 Q The moneys -- Mr. Donziger</p> <p>21 noted in connection with the Elliot pitch</p> <p>22 that he had raised approximately</p> <p>23 \$30 million for the Ecuador case.</p> <p>24 Do you know the current</p> <p>25 whereabouts of any of those funds?</p>
<p style="text-align: right;">Page 167</p> <p>1 LAURA MILLER</p> <p>2 your respective ownership of the asset?</p> <p>3 MR. DONZIGER: I'm going to</p> <p>4 object on marital privilege grounds.</p> <p>5 MS. NEUMAN: About asset</p> <p>6 ownership?</p> <p>7 MR. DONZIGER: Yeah.</p> <p>8 Q Do you decline to answer?</p> <p>9 A I decline to answer.</p> <p>10 MR. DONZIGER: She's already</p> <p>11 answered how that apartment is held.</p> <p>12 Q So setting aside things that</p> <p>13 you own jointly, do you have other</p> <p>14 knowledge of things that Mr. Donziger</p> <p>15 owns that you didn't list here?</p> <p>16 A I have no knowledge.</p> <p>17 Q Reading 19, can you clarify</p> <p>18 why you didn't think to list the</p> <p>19 apartment? I just want to understand how</p> <p>20 you were thinking of the question.</p> <p>21 A I'm not a lawyer. I didn't</p> <p>22 realize I did this on my own. I didn't</p> <p>23 realize.</p> <p>24 MS. NEUMAN: I'm going to</p> <p>25 hand the witness a document that was</p>	<p style="text-align: right;">Page 169</p> <p>1 LAURA MILLER</p> <p>2 A I'm not aware of any of</p> <p>3 this.</p> <p>4 Q Do you ever assist</p> <p>5 Mr. Donziger in preparing investor</p> <p>6 updates?</p> <p>7 A No.</p> <p>8 Q Do you ever assist in</p> <p>9 investor pitches or presentations?</p> <p>10 A No.</p> <p>11 Q Are you ever involved in any</p> <p>12 fundraising activities related to the</p> <p>13 Ecuador case?</p> <p>14 A No.</p> <p>15 MR. DONZIGER: Objection.</p> <p>16 Asked and answered earlier in the</p> <p>17 deposition. But you can answer</p> <p>18 again.</p> <p>19 A No.</p> <p>20 Q Were you aware that Mr. Page</p> <p>21 has an interest in the Ecuador judgment?</p> <p>22 A No, I was not.</p> <p>23 Q Are you aware of whether</p> <p>24 Ms. Hinton has an interest in the Ecuador</p> <p>25 judgment?</p>

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1 LAURA MILLER

2 A No, I'm not.

3 MS. NEUMAN: I'm going to

4 mark as Exhibit 5668, a document

5 bearing the Bates number LB Miller

6 112 through 113.

7 (The above-referred-to

8 document was marked as Exhibit 5668

9 for identification, as of this date.)

10 Q It's a document you

11 produced, Ms. Miller?

12 A Yes.

13 Q In the top, are you

14 commenting on a letter that Mr. Donziger

15 is sending to the Wall Street Journal

16 related to the case?

17 MR. DONZIGER: Objection.

18 Please give her a chance to read the

19 e-mail before you ask her a question

20 about it. So I want to be sure the

21 witness has a chance to read the

22 e-mail before answering any questions

23 about it.

24 Q Ms. Miller, you want to let

25 us know when you've read the e-mail?

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1 LAURA MILLER

2 A I've read it.

3 Q Were you commenting on the

4 below e-mail before it was sent out?

5 A Yes.

6 Q In your comment, you

7 say, "This looks very good. My only

8 suggestion is to add a bit more to the

9 paragraph where you talk about Chevron

10 hiding the evidence that the judge lied.

11 I would say that an expert did a forensic

12 study on his computer and found that the

13 judge did write the final judgment and

14 that Chevron had the expert's testimony

15 redacted." Do you see that?

16 A Mm-hmm.

17 Q Yes?

18 A Yes.

19 Q And what are you referring

20 to when you say "Chevron had the expert's

21 testimony redacted"?

22 MR. DONZIGER: Objection.

23 THE WITNESS: I agree. This

24 was 2015.

25 MR. DONZIGER: This is not

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1 LAURA MILLER

2 related to money, investors. This is

3 just wasting time.

4 Q Can you substantively answer

5 the question?

6 A No.

7 Q Are you refusing to answer

8 or you don't know the answer?

9 A No. I honestly can't

10 remember 2015. I don't remember even

11 what the article was about.

12 Q Other than for the provision

13 of services from Mr. Zelman, are you

14 aware of Mr. Donziger using his interest

15 in the judgment for any purpose to obtain

16 anything?

17 A I'm not aware.

18 Q And are you aware of

19 Mr. Donziger disposing of any assets

20 since 2014?

21 A I'm not aware.

22 MS. NEUMAN: Marking as

23 Exhibit 5669, a document summarizing

24 the amounts related to Judge Kaplan's

25 issuance of a new judgment in the

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1 LAURA MILLER

2 amount of \$666,476.34.

3 (The above-referred-to

4 document was marked as Exhibit 5669

5 for identification, as of this date.)

6 Q Were you aware, Ms. Miller,

7 that the court had recently issued a

8 judgment against Mr. Donziger for an

9 additional \$666,000?

10 A I was aware, yes.

11 Q If you look on page 2,

12 347,000 of that judgment is based on

13 transfers that were made of moneys into

14 your accounts. Do you see that?

15 A I see that.

16 Q And were you aware that

17 that's the case?

18 A No. I was not aware.

19 Q And to the extent this

20 judgment is based on transfers made into

21 your accounts that the court has found

22 Chevron has a constructive trust over,

23 are you willing to voluntarily return

24 those funds to Chevron?

25 MR. DONZIGER: Objection.

<p style="text-align: right;">Page 174</p> <p>1 LAURA MILLER</p> <p>2 Marital privilege. Don't answer the</p> <p>3 question.</p> <p>4 A I'm not going to answer the</p> <p>5 question.</p> <p>6 MS. NEUMAN: Go off the</p> <p>7 record.</p> <p>8 THE VIDEOGRAPHER: The time</p> <p>9 on the video monitor is 2:44 p.m.</p> <p>10 We're off the record.</p> <p>11 (A short recess was taken.)</p> <p>12 THE VIDEOGRAPHER: We are</p> <p>13 back on the record. The time on the</p> <p>14 video monitor is 3 p.m. This starts</p> <p>15 Media 4.</p> <p>16 MR. DONZIGER: Before we</p> <p>17 proceed, I just want to state</p> <p>18 something for the record with regard</p> <p>19 to your last question. I think that</p> <p>20 last question asking Ms. Miller if</p> <p>21 she'd be willing to disgorge that</p> <p>22 amount of money to Chevron was</p> <p>23 inappropriate. And I think it was an</p> <p>24 attempt to intimidate Ms. Miller and</p> <p>25 to interfere in her marital relations</p>	<p style="text-align: right;">Page 176</p> <p>1 LAURA MILLER</p> <p>2 A I have no knowledge.</p> <p>3 Q To your knowledge, has he</p> <p>4 ever been a trust beneficiary?</p> <p>5 A I have no knowledge.</p> <p>6 Q Has Mr. Donziger opened any</p> <p>7 type of financial account abroad, to your</p> <p>8 knowledge, since 2012?</p> <p>9 A I have no knowledge.</p> <p>10 Q We discussed earlier two</p> <p>11 credit cards that Mr. Donziger holds:</p> <p>12 Citibank and TD.</p> <p>13 A Mm-hmm.</p> <p>14 Q Does he have any other</p> <p>15 credit cards that you're aware of?</p> <p>16 A Not that I'm aware of.</p> <p>17 Q Since he closed the TD Bank</p> <p>18 accounts, I believe you said you're not</p> <p>19 aware of any new domestic accounts he's</p> <p>20 opened; is that right?</p> <p>21 A That's correct.</p> <p>22 Q Are you aware of any other</p> <p>23 payments made by Mr. Waters at</p> <p>24 Mr. Donziger's request other than the</p> <p>25 loan to you that we talked about earlier?</p>
<p style="text-align: right;">Page 175</p> <p>1 LAURA MILLER</p> <p>2 and cause division in our marriage.</p> <p>3 So I think that it should</p> <p>4 not have been asked. There's no</p> <p>5 judgment against her. There's no</p> <p>6 action against her. Judge Kaplan</p> <p>7 issued that judgment against me, not</p> <p>8 her. I want to be very clear about</p> <p>9 that. That question was entirely</p> <p>10 inappropriate and, again, I believe</p> <p>11 an attempt to intimidate the witness.</p> <p>12 MS. NEUMAN: That's</p> <p>13 absolutely untrue. Everything you</p> <p>14 just said is untrue. So we'll get</p> <p>15 back to the deposition.</p> <p>16 Q Ms. Miller, have you and</p> <p>17 Mr. Donziger created any trusts since</p> <p>18 2012?</p> <p>19 A No.</p> <p>20 Q Has Mr. Donziger created any</p> <p>21 trusts since 2012 that you know of?</p> <p>22 A I have no knowledge.</p> <p>23 Q To your knowledge, is</p> <p>24 Mr. Donziger currently the trustor or</p> <p>25 trustee of any trust?</p>	<p style="text-align: right;">Page 177</p> <p>1 LAURA MILLER</p> <p>2 A I have no knowledge.</p> <p>3 Q Have you ever been involved</p> <p>4 in any shareholder or activism type</p> <p>5 activities against Chevron?</p> <p>6 MR. DONZIGER: Objection.</p> <p>7 Irrelevant.</p> <p>8 THE WITNESS: I object also.</p> <p>9 Q So you decline to answer?</p> <p>10 A I decline to answer.</p> <p>11 Q Would you have -- when</p> <p>12 Mr. Page was advising you, could you</p> <p>13 estimate about how much time he spent</p> <p>14 doing that?</p> <p>15 A Just a few hours.</p> <p>16 Q And do you know what he</p> <p>17 normally charges for his services?</p> <p>18 A I have no idea.</p> <p>19 MS. NEUMAN: So we've</p> <p>20 discussed briefly off the record that</p> <p>21 Ms. Miller and Mr. Donziger need to</p> <p>22 leave by 3:30, that we aren't in</p> <p>23 agreement about the questions that</p> <p>24 the witness has declined to answer.</p> <p>25 So we're going to address</p>

C E R T I F I C A T I O N

I, ANTHONY GIARRO, a Shorthand Reporter and a Notary Public, do hereby certify that the foregoing witness, LAURA MILLER, was duly sworn on the date indicated, and that the foregoing, to the best of my ability, is a true and accurate transcription of my stenographic notes.

I further certify that I am not employed by nor related to any party to this action.



ANTHONY GIARRO